

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NORTH AMERICAN KARAOKE-WORKS TRADE  
ASSOCIATION, INC.,

Plaintiff-Counterclaim  
Defendant,

-against-

ENTRAL GROUP INTERNATIONAL, LLC,

Defendant-  
Counterclaimant,

-against-

SAM CHAN and RAY YIM,

Counterclaim  
Defendants.

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**DECLARATION OF DAVID J. HOFFMAN**

David J. Hoffman declares as follows:

1. I am counsel for the Plaintiff and all Counterclaim Defendants in this action.

2. The North American Karaoke-works Trade Association, Inc. is a not-for-profit New York corporation.

3. Neither Sam Chan nor Ray Yim receives any compensation for their services as officers of NAKTA.

4. Attached hereto is a true copy of the Master Agreement of Defendant Entral Group International, LLC, and on information and belief is the document upon which EGI bases its claims for copyright infringement.

Case No.

06-cv-  
5158(LTS)(MHD)

ECF CASE

5. Prior to making this motion, I consulted with Robert Hanlon, Esq., counsel for EGI informing him of the Counterclaim defendants intention to make this motion to dismiss based upon a failure to state a claim. Mr. Hanlon indicated that EGI would stand upon its pleadings as presently stated. As EGI indicated it would not replead or withdraw its counterclaim, Counterclaim Defendants have proceeded with this motion in accordance with the Court's individual practices.

6. I make the foregoing declaration under penalty of perjury.

Dated: New York, New York  
August 24, 2006

/s/David J. Hoffman  
David J. Hoffman (DH 7605)  
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ATTORNEY FOR PLAINTIFF